

BALLON STOLL P.C.

COUNSELLORS AT LAW

FOUNDED 1931

810 SEVENTH AVENUE
SUITE 405
NEW YORK, NY 10019
Ph: 212-575-7900
www.ballonstoll.com

September 21, 2023

MARSHALL B. BELLOVIN, ESQ.
mbellovin@ballonstoll.com

VIA ECF

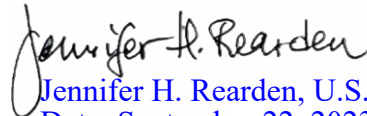
The Honorable Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street, Room 1010
New York, NY 10007

Application GRANTED. The deadline for the parties' submission of their settlement papers is extended to **September 22, 2023** (today).

The Clerk of Court is directed to terminate ECF No. 34.

RE: Bitsadze v. Simonsen et al.,
Docket No. 22-cv-03142 (JHR)

SO ORDERED.



Jennifer H. Rearden, U.S.D.J.
Date: September 22, 2023

Dear Judge Rearden:

This office represents the Defendants, Lisa Simonsen and Charles N. Atkins (collectively "Defendants") in the above-referenced action. We write with the consent of the opposing counsel, to respectfully, jointly request a one (1) day extension of time to submit the settlement agreement to the Court along with a joint letter explaining the basis for the proposed settlement and why, if the parties contemplate dismissal under Rule 41, it should be approved as fair and reasonable.

The parties have signed the Settlement Agreement, however Defendants need additional time, till tomorrow, to notarize the Confessions of Judgment, and finalize the settlement documents, due to a health issue.

This is the second request for an extension of time to submit the Settlement Agreement and Joint Letter.

Thank you for your time and consideration of this request.

Respectfully submitted

s/Marshall Bellovin
Marshall B. Bellovin, Esq.

cc.: Adam Sackowitz, Esq. (via ECF)